REMARKS

Claims 1-16 are pending. The applicants have amended the specification to reference FIG. 20.

Claim 1 stands rejected as being anticipated by U.S Patent No. 6,049,339 to Schiller et al. ("Schiller"). The applicants respectfully traverse this rejection because Schiller fails to disclose "determining a number of outlines of pieces of artwork that map to a cell of the grid", as recited by claim 1.

The Examiner contends that column 6, lines 43-47 of Schiller discloses the cited element. The applicants respectfully disagree. Even assuming *arguendo* that Schiller's tiles are the same as the applicants' cells, the process of Schiller does not count the number of paths that occur within a tile. Rather, the process of Schiller counts the number of intersections between paths that occur within a tile. See the cited text, which reads "a tile's complexity value could reflect the *number of path intersections occurring within its boundary*" (emphasis added). Determining the number of path intersections that occur within a tile's boundary, as described by Schiller, is not the same as determining a number of outlines of pieces of artwork that map to a cell, as recited by claim 1. Thus, Schiller fails to disclose the cited element of claim 1.

Like Schiller, U.S. Patent No. 6,020,897 to Carlsen et al. also fails to disclose the cited element of claim 1. For at least these reasons, the applicants respectfully submit that claim 1 and claims 2-14, which depend from claim 1, are in condition for allowance.

Claim 15 stands similarly rejected. Claim 15 includes an element corresponding to the cited element of claim 1 and the foregoing arguments apply with equal force. For at least this reason, the applicants respectfully submit that claim 15 and claim 16, which depend from claim 15, are in condition for allowance. The applicants ask that all claims be allowed.

On July 23, 2001, the applicants mailed to the PTO a reference entitled "Graphics Gems IV" along with a corresponding IDS statement, PTO form 1449, and return postcard. Copies of these items are enclosed for the Examiner's convenience. From the return post card, it appears that the PTO received this correspondence on July 30, 2001. The applicants respectfully request that the Examiner initial next to the item listed in the submitted PTO form 1449, sign the bottom

of the submitted PTO form 1449, and return a copy of the initialed and signed form to the

applicants. Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: _December 11, 2001_

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Version with markings to show changes made

In the specification:

Paragraph beginning at page 14, line 13 has been amended as follows:

FIG. 17 shows an illustration 130 of artwork objects 132-142. As shown, many of the objects 132-142 appear clustered near object 138. FIG. 18 shows a mapping of the artwork objects onto an off-screen low-resolution grid 144. The resolution of the grid 144 may be fixed or dynamically determined. Counting the number of objects having an outline in each grid cell can identify complex regions. FIG. 19 shows a count of objects whose paths enter each cell in the low-resolution grid. As shown, grid cell 146 is entered by objects 136-142 and has a value of "4". A threshold can identify those grid cells having highly complex geometry. For example, a user may define any cell having a value of "4" or more as being highly complex. Based on this threshold, a grid cell may be classified as a complex region and rasterized instead of adding objects in the cell into the planar map (as illustrated in FIG. 20). Alternatively, the process may use different techniques to produce a threshold (e.g., set the threshold so that it includes the most complex 5% of grid cells).